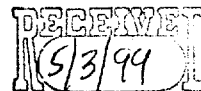




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VITAMIN SHOPPE INDUSTRIES INC.

April 27, 1999



Elizabeth A. Yetley, Ph.D.
Director
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street S.W.
Washington D.C. 20204

Re: FDCA 403(r)(6) Notification

Dear Dr. Yetley:

Pursuant to section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (FDCA), 21 U.S.C. 343(r)(6), and implementing Food and Drug Administration regulation, 21 C.F.R. 101.93 (62 Fed. Reg. 49886 (Sept 23, 1997)), the Vitamin Shoppe Inc. submits this notification that statements are included in labeling its dietary supplements, as attached.

The Vitamin Shoppe Inc. at 4700 Westside Avenue, North Bergen, New Jersey is the distributor of the dietary supplements.

The undersigned certifies that the information contained in this notice is complete and accurate, and that the notifying firm has substantiation that each statement is truthful and not misleading.

Respectfully yours,

A handwritten signature in cursive script that reads 'Patti Ann Kelly'.

Patti Ann Kelly, Ph.D.
Director of Scientific and Regulatory Affairs
The Vitamin Shoppe Inc.

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**Name of the Vitamin Shoppe brand Dietary Supplement and Ingredient
that is the Subject of the Statement**

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Advanced Liver Support	1581	Milk Thistle (<i>Silybum marianum</i>) (seed); standardized to 80% silymarin as silybin	1) Milk Thistle helps maintain healthy liver function.
Antioxidant Cocktail	1433	Vitamin A (as beta-carotene)	1) Beta-carotene guards against damaging oxidants. 2) Beta-carotene is a potent lipid-soluble antioxidant. 3) Beta-carotene is a powerful antioxidant that protects against free radical damage.
		Vitamin C (as ascorbic acid)	1) Vitamin C is an antioxidant that protects against free radical damage. 2) Vitamin C helps to prolong the antioxidant activity of vitamin E.
		Vitamin E (as d-alpha, d-gamma, d-beta, d-delta tocopherols)	1) Vitamin E promotes cardiovascular health. 2) Vitamin E protects the body against free radical damage. 3) Vitamin E protects cell membranes against damage from free radicals. 4) Vitamin E is a major lipid soluble antioxidant.
		Selenium (as selenomethionine)	1) Selenium is an essential trace mineral that supports the function of antioxidant enzymes. 2) Selenium supports the antioxidant activity of vitamin E.
		Lycopene	1) Lycopene is an antioxidant that protects the body from free radicals.
		Lutein	1) Lutein protects the body against damage from free radicals.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Antioxidant Cocktail Powder	1535	Vitamin A (as beta-carotene)	1) Beta-carotene guards against damaging oxidants. 2) Beta-carotene is a potent lipid-soluble antioxidant. 3) Beta-carotene is a powerful antioxidant that protects against free radical damage.
		Vitamin C (as ascorbic acid)	1) Vitamin C is an antioxidant that protects organs against free radical damage. 2) Vitamin C helps to prolong the antioxidant activity of vitamin E.
		Vitamin E (as d-alpha, d-gamma, d-beta, d-delta tocopherols)	1) Vitamin E promotes cardiovascular health. 2) Vitamin E protects the body against free radical damage. 3) Vitamin E protects cell membranes against damage from free radicals. 4) Vitamin E is a major lipid soluble antioxidant.
		Selenium (as selenomethionine)	1) Selenium is an essential trace mineral that supports the function of antioxidant enzymes. 2) Selenium supports the antioxidant activity of vitamin E.
		Lycopene	1) Lycopene is an antioxidant that protects the body from free radicals.
Antioxidant Phytors	1430	Lutein	1) Lutein protects the body against damage from free radicals.
		Green tea and red wine extracts; standardized to 20% polyphenol catechins	1) Polyphenol catechins are antioxidants that protect against free radical damage.
		Grape seed extract; standardized to contain 85% proanthocyanodins	1) Proanthocyanodins are antioxidants that protect against free radical damage.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Cholesaid	1220,1221	Chromium (as chromium polynicotinate)	1) Chromium is involved in glucose utilization. 2) Chromium supports metabolism of fats and carbohydrates. 3) Chromium promotes healthy blood lipids.
		Niacin (as inositol hexaniacinate)	1) Niacin helps maintain healthy blood lipids.
		Oat bran (<i>Avena sativa</i>) (hulls)	1) Oat bran provides soluble fiber that promotes healthy blood cholesterol levels.
		Guar gum	1) Guar gum promotes healthy intestine function.
		Psyllium (<i>Plantago asiatica</i>) (seed husks)	1) Psyllium seed husks promote colon health. 2) Psyllium seed husks help maintain intestine health. 3) Psyllium seed husks support digestive health.
CircuPrime Prime Time	1502	Horse Chestnut (<i>Aesculus hippocastanum</i>) (seed); standardized to 22% escins	1) Horse Chestnut promotes healthy blood vessel function. 2) Horse Chestnut supports normal blood flow. 3) Horse Chestnut supports healthy capillaries.
Fem Balance	1577, 1578	Black Cohosh (<i>Cimicifuga racemosa</i>) (root); standardized to 2.5% triterpene glycosides	1) Black Cohosh promotes a sense of well-being during a woman's life change.
Fem Balance Plus	1582	Calcium (as calcium carbonate)	1) Calcium helps maintain healthy bones. 2) Calcium promotes healthy bone growth.
		Black Cohosh (<i>Cimicifuga racemosa</i>) (root); standardized to 2.5% triterpene glycosides	1) Black Cohosh promotes a sense of well-being during a woman's life change.
		Soy isoflavones	1) Isoflavones help to maintain a sense of balance during a woman's life change.
Ginkgo Circu Support	1575	Ginkgo biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgoflavoglycosides, 6% terpene lactones	1) Ginkgo biloba supports circulatory system function.
		Gotu Kola (<i>Centella asiatica</i>) (herb); standardized to 10% asiaticosides triterpenes	1) Gotu Kola promotes circulatory system health.
		Horse Chestnut (<i>Aesculus hippocastanum</i>) (seed); standardized to 22% escins	1) Horse Chestnut promotes healthy blood vessel function. 2) Horse Chestnut supports normal blood flow. 3) Horse Chestnut supports healthy capillaries.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Ginkgo DHA Mind	1571	Ginkgo biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgoflavoglycosides, 6% terpene lactones	1) Ginkgo biloba promotes healthy brain function. 2) Ginkgo biloba supports mental function. 3) Ginkgo biloba supports brain function with aging. 4) Ginkgo biloba promotes healthy cognitive function. 5) Ginkgo biloba supports normal memory.
		Docosahexaenoic acid	1) Docosahexaenoic acid supports nervous system development and function. 2) Docosahexaenoic acid supports brain function with aging.
Ginkgo Heart, Mind and Soul	1574	Ginkgo biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgoflavoglycosides, 6% terpene lactones	1) Ginkgo biloba promotes healthy brain function. 2) Ginkgo biloba supports mental function. 3) Ginkgo biloba supports brain function with aging. 4) Ginkgo biloba promotes healthy cognitive function. 5) Ginkgo biloba supports normal memory.
		Garlic extract (<i>Allium sativa</i>) (bulb)	1) Garlic supports cardiovascular system function. 2) Garlic promotes healthy blood lipids.
		Korean ginseng (<i>Panax ginseng</i>) (root)	1) Ginseng supports the body's energy levels.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Ginkgo Neuro-Mind	1570	Vitamin B12 (as cyanocobalamin)	1) Vitamin B12 is essential for function of the nervous system. 2) Vitamin B12 supports nervous system function, especially with aging.
		Vitamin B6 (as pyridoxine HCl)	1) Vitamin B6 is essential for nervous system function.
		Ginkgo biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgoflavoglycosides, 6% terpene lactones	1) Ginkgo biloba promotes healthy brain function. 2) Ginkgo biloba supports mental function. 3) Ginkgo biloba supports brain function with aging. 4) Ginkgo biloba promotes healthy cognitive function. 5) Ginkgo biloba supports normal memory.
		Phosphatidylserine	1) Phosphatidylserine maintains normal brain function. 2) Phosphatidylserine promotes healthy nervous system function. 3) Phosphatidylserine supports brain function with aging.
Ginkgo with Heart	1576	Vitamin E (as d-alpha, d-gamma, d-beta, d-delta tocopherols)	1) Vitamin E promotes cardiovascular health. 2) Vitamin E protects the body against free radical damage. 3) Vitamin E protects cell membranes against damage from free radicals. 4) Vitamin E is a major lipid soluble antioxidant. 5) Vitamin E is essential for the function of red blood cells.
		Ginkgo biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgoflavoglycosides, 6% terpene lactones	1) Ginkgo biloba supports circulatory system function.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Immune Complete	1579	Vitamin A (as beta-carotene)	1) Beta-carotene guards against damaging oxidants. 2) Beta-carotene is a potent lipid-soluble antioxidant. 3) Beta-carotene is a powerful antioxidant that protects against free radical damage. 4) Beta-carotene is the precursor to vitamin A, which is essential for healthy immune system function.
		Vitamin C (as ascorbic acid)	1) Vitamin C is an antioxidant that protects against free radical damage. 2) Vitamin C supports the body's immune system. 3) Vitamin C supports healthy blood vessels. 4) Vitamin C helps to prolong the antioxidant activity of vitamin E.
		Zinc (as zinc gluconate)	1) Zinc supports immune system function.
		Echinacea (<i>Echinacea purpurea</i>) (root); standardized to 4% echinacosides	1) Echinacea supports the body's defense systems. 2) Echinacea promotes healthy immune system function.
Memory Power with Ginkgo Biloba Extract	1172, 1173	Ginkgo biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgolavoglycosides, 6% terpene lactones	1) Ginkgo biloba promotes healthy brain function. 2) Ginkgo biloba supports mental function. 3) Ginkgo biloba supports brain function with aging. 4) Ginkgo biloba promotes healthy cognitive function. 5) Ginkgo biloba supports normal memory.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Nutritional Support for the Heart 1408		L-Carnitine	1) L-carnitine supports circulatory system function. 2) L-carnitine promotes healthy circulation.
		Vitamin C (as ascorbic acid)	1) Vitamin C is an antioxidant that protects against free radical damage. 2) Vitamin C supports healthy blood vessels.
		Vitamin E (as d-alpha, d-gamma, d-beta, d-delta tocopherols)	1) Vitamin E promotes cardiovascular health. 2) Vitamin E protects the body against free radical damage. 3) Vitamin E protects cell membranes against damage from free radicals. 4) Vitamin E is a major lipid soluble antioxidant. 5) Vitamin E is essential for the function of red blood cells.
		Chromium (as chromium picolinate)	1) Chromium supports energy metabolism. 2) Chromium promotes healthy blood lipids.
		Folic acid	1) Folic acid works with B vitamins to support production of energy. 2) Folic acid supports the function of the cardiovascular system. 3) Folic acid, along with B vitamins, promotes healthy homocysteine blood levels.
		Potassium (as ascorbate, aspartate, orotate)	1) Potassium is essential for healthy skeletal and heart muscle function. 2) Potassium supports cardiovascular health.
Osteo-Support	1476	Garlic (<i>Allium sativa</i>) (bulb)	1) Garlic supports cardiovascular system function. 2) Garlic promotes healthy blood lipids.
		Calcium (as carbonate, hydroxyapatite)	1) Calcium helps maintain healthy bones. 2) Calcium promotes healthy bone growth.
		Magnesium (as oxide, citrate)	1) Magnesium promotes bone health and maintains teeth.
		Vitamin D (as cholecalciferol)	1) Vitamin D supports normal bone structure. 2) Vitamin D supports healthy bone growth.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
Osteo Protector	1584	Vitamin D (as cholecalciferol)	1) Vitamin D supports normal bone structure. 2) Vitamin D supports healthy bone growth.
		Calcium (as carbonate, hydroxyapatite)	1) Calcium helps maintain healthy bones. 2) Calcium promotes healthy bone growth.
		Magnesium (as oxide, citrate)	1) Magnesium promotes bone health and maintains teeth.
		Ipriflavone	1) Ipriflavone promotes healthy bones. 2) Ipriflavone improves bone health. 3) Ipriflavone helps maintain healthy bone density.
Recall Support	1358, 1359	Vitamin B6 (as pyridoxine HCl)	1) Vitamin B6 is essential for nervous system function.
		Ginkgo Biloba (<i>Ginkgo biloba</i>) (leaf); standardized to 24% ginkgoflavoglycosides, 6% terpene lactones	1) Ginkgo biloba promotes healthy brain function. 2) Ginkgo biloba supports mental function. 3) Ginkgo biloba supports brain function with aging. 4) Ginkgo biloba promotes healthy cognitive function. 5) Ginkgo biloba supports normal memory.
		Phosphatidylserine	1) Phosphatidylserine maintains normal brain function. 2) Phosphatidylserine promotes healthy nervous system function. 3) Phosphatidylserine supports brain function with aging.
R n R Rest and Relax	1128	Valerian (<i>Valerian officinalis</i>) (root)	1) Valerian root promotes rest and relaxation. 2) Valerian root promotes calmness.
Snooze-in	1353, 1354	Melatonin	1) Melatonin promotes normal sleep. 2) Melatonin helps maintain healthy sleep cycles.
		Valerian (<i>Valerian officinalis</i>) (root)	1) Valerian root promotes rest and relaxation. 2) Valerian root promotes calmness.
		Hops (<i>Humulus lupulux</i>) (cones)	1) Hops exerts a calming and soothing effect on the body.

<u>Product Names</u>	<u>VS #</u>	<u>Ingredients</u>	<u>Structure/Function Statements</u>
St. John's Wort All Day Adapt	1589	St. John's Wort (<i>Hypericum perforatum</i>) (flowers); standardized to 0.3% hypericin Siberian ginseng (<i>Eleutherococcus sinicosus</i>) (root); standardized to 0.8% eleutherosides	1) St. John's Wort promotes a sense of well-being. 2) St. John's Wort promotes calmness. 1) Ginseng supports the body's energy levels.
St. John's Wort Sound-A-Sleep	1587	St. John's Wort (<i>Hypericum perforatum</i>) (flowers); standardized to 0.3% hypericin Kava Kava (<i>Piper methysticum</i>) (root); standardized to 30% kavalactones Valerian (<i>Valerian officinalis</i>) (root)	1) St. John's Wort promotes a sense of well-being. 2) St. John's Wort promotes calmness. 1) Kava kava exerts a calming and soothing effect on the body. 2) Kava kava promotes relaxation. 1) Valerian root promotes rest and relaxation. 2) Valerian root promotes calmness.
St. John's Wort Ultra Stressless	1563	Vitamin B12 (as cyanocobalamin) Vitamin B6 (as pyridoxine HCl) St. John's Wort (<i>Hypericum perforatum</i>) (flowers); standardized to 0.3% hypericin	1) Vitamin B12 is essential for nervous system function. 2) Vitamin B12 supports energy production. 1) Vitamin B6 helps supports healthy metabolism. 2) Vitamin B6 is essential for nervous system function. 3) Vitamin B6 supports a healthy cardiovascular system. 1) St. John's Wort promotes a sense of well-being. 2) St. John's Wort promotes calmness.
Super Energy Up	1206, 1207	Korean ginseng (<i>Panax ginseng</i>) (root)	1) Ginseng supports the body's energy levels.
Super Snooze	1126, 1127	Valerian (<i>Valerian officinalis</i>) (root) Hops (<i>Humulus lupulux</i>) (cones)	1) Valerian root promotes rest and relaxation.. 2) Valerian root promotes calmness. 1) Hops exerts a calming and soothing effect on the body.